

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF DELAWARE

SARA S. ECHEVARRIA, :
: Plaintiff, : Case No.: 05-284 (GMS)
: :
v. : Removed from Superior Court,
: New Castle County, Delaware
: C.A. No.: 05C-03-188 WCC
: U-HAUL INTERNATIONAL, INC., :
: ROGER MAYFIELD, and :
: NATIONWIDE GENERAL INSURANCE :
: COMPANY, :
: Defendants. :
:

JOINT PROPOSED DISCOVERY PLAN

Counsel for the parties in the above-captioned action, having conferred pursuant to FED. R. CIV. P. 26(f) on November 29, 2005, submit the following as their written report outlining their proposed discovery plan.

1. The parties will exchange the information required by FED. R. CIV. P. 26(a)(1) on or before Friday, December 16, 2005.
2. The parties propose Wednesday, February 1, 2006 as the deadline for filing motions to join other parties or to amend the pleadings.
3. Interrogatories, Requests for Production, Requests for Inspection and Requests for Admission will be directed to all parties concerning liability and damages. It is anticipated that depositions of plaintiff, defendants, defendants' agents, servants and employees, plaintiff's treating physicians, and several non-party individuals will be scheduled.
4. The parties propose that all fact discovery be completed by June 30, 2006.

5. The parties propose the following deadlines for expert disclosures:

- a. Plaintiff's expert reports due Tuesday, August 1, 2006;
- b. Defendant's expert reports due Friday, September 1, 2006;
- c. Rebuttal reports due Monday, October 2, 2006.

6. The parties propose that all expert depositions be completed by Friday, December 1, 2006.

7. The parties propose that all dispositive motions and *Daubert* motions be filed on or before Monday, January 15, 2007.

8. At this time, the parties propose that there is no need for limitations on discovery other than those set forth in the applicable Federal Rules of Civil Procedure and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware. It is agreed that any further limitations on discovery may be added by consent or by further Order of this Court.

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ Jennifer M. Kinkus
Richard A. DiLiberto, Jr. (#2429)
Jennifer M. Kinkus (#4289)
The Brandywine Building, 17th Floor
1000 West Street
Wilmington, Delaware 19899-0391
(302) 571-6657
Attorneys for Plaintiff

BLANK ROME, LLP

/s/ Steven L. Caponi
Steven L. Caponi (#3484)
Chase Manhattan Centre
1201 Market Street, Suite 800
Wilmington, Delaware 19801
(302) 425-6408
Attorneys for Defendant U-Hall International

MORGAN SHELBY & LEONI, PC

/s/ Robert J. Leoni

Robert J. Leoni (#2888)
221 Main Street
Stanton, Delaware 19804
(302) 995-6121
Attorneys for Defendant Nationwide Insurance
Company

Dated: December 8, 2005

SO ORDERED, this _____ day of _____, 200__.

Judge Gregory M. Sleet

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Plaintiff,	:	Case No.: 05-284 (GMS)
v.	:	Removed from Superior Court, New Castle County, Delaware
U-HAUL INTERNATIONAL, INC.,	:	C.A. No.: 05C-03-188 WCC
ROGER MAYFIELD, and	:	
NATIONWIDE GENERAL INSURANCE	:	
COMPANY,	:	
Defendants.	:	

PLAINTIFF'S CERTIFICATE OF SERVICE

I, Jennifer M. Kinkus, Esquire hereby certify that on December 8, 2005, I caused to be electronically filed a true and correct copy of the **Joint Proposed Discovery Plan** with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Steven L. Caponi, Esquire
Blank Rome, LLP
Chase Manhattan Centre
1201 Market Street, Suite 800
Wilmington, Delaware 19801

Robert J. Leoni, Esquire
Morgan Shelby & Leoni, PC
221 Main Street
Stanton, Delaware 19804

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Jennifer M. Kinkus
Richard A. DiLiberto, Jr. (#2429)
Jennifer M. Kinkus (#4289)
The Brandywine Building, 17th Floor
1000 West Street
Wilmington, Delaware 19899-0391
(302) 571-6657
Attorneys for Plaintiff